

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Alfredo Martin Unzueta,

Case: 1:20-mj-30080

Judge: Morris, Patricia T.

Filed: 02-14-2020 At 10:02 AM

CMP USA v. Alfredo Martin Unzueta (krc)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 14, 2020 in the county of Isabella in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 117

Defendant assaulted L.W., someone that he cohabitates with and someone that is similarly situated to a spouse, after having been convicted of domestic violence in the Isabella County Trial Court on or about February 28, 2000 and on or about May 23, 2002, both of which involved a victim who was a spouse or intimate partner, in violation of 18 U.S.C. section 117.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

*Complainant's signature*Autume Balcom, BIA*Printed name and title*

Sworn to before me and signed in my presence and/or by reliable electronic means.

Date: 02/14/2020*Judge's signature*City and state: Bay City, MichiganPatricia T. Morris, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT  
FOR ALFREDO MARTIN UNZUETA**

I, Autume Balcom, being duly sworn, depose and state:

1. I am an officer with the Bureau of Indian Affairs and have been a law enforcement officer for approximately 12 years. During my career I have been involved in numerous investigations concerning domestic violence. The following is based on a statement from witnesses and statements from other law enforcement officers and individuals.
2. The information included in this affidavit is provided for the limited purpose of establishing probable cause that Alfredo Martin Unzueta committed the offense of domestic assault by an habitual offender on or around February 14, 2020, in violation of 18 U.S.C. § 117 and therefore it does not contain all of the facts known to me. Additionally, unless otherwise noted, wherever in this affidavit I assert that an individual made a statement, that statement is described in substance herein and is not intended to be a verbatim recitation of such statement.
3. According to L.W., she was assaulted by her intimate partner, Alfredo Martin Unzueta on or about February 14, 2020 at 210 ½ N. Lansing Road, Mt. Pleasant, MI on the Isabella Reservation in Indian country.
4. According to L.W., the assault consisted of Alfredo Unzueta intentionally pinned her down on a couch against her will during an argument. L.W. said Unzueta held her down by her shoulders.
5. L.W. tried to get up but Unzueta physically prevented it to the point that they both ended up falling onto the floor. Unzueta caused visible injuries to L.W. in the form of scratches on her face.

6. L.W. told police that she scratched Unzueta's face when she was trying to get him off of her during the assault.
7. Police observed scratches on the faces of both L.W. and Unzueta.
8. Unzueta admitted to the police that he must have received the scratches on his face when he was trying to prevent L.W. from leaving the residence. When asked about the injuries to L.W., Unzueta gave conflicting explanations about how those injuries were inflicted.
9. Defendant was previously convicted of domestic violence in the Isabella County Trial Court on or about February 28, 2000 and on or about May 23, 2002, both of which involved a victim who was Unzueta's spouse.
10. L.W. told police that she is Indian. The police verified that she has been previously charged criminally in the Saginaw Chippewa Tribal Court and are aware that Tribal Court cannot charge someone with a crime there unless that person is Indian. Unzueta is non-Indian.
11. L.W. told police that she has been the victim of Unzueta's domestic violence at least three of four times in the past two years but that none of those instances has been reported to the police or has been prosecuted.
12. Based on the above-described information, there is probable cause to believe that on or around February 14, 2020, Alfredo Martin Unzueta committed a domestic assault by an habitual offender, in violation of 18 U.S.C. §§ 117.



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Autume Balcom, BIA

Subscribed and sworn to before me and signed in my presence,  
and/or by reliable electronic means this 14th day of February, 2020.



HON. PATRICIA T. MORRIS  
United States Magistrate Judge